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Attorneys for Cooper-Standard Automotive, Inc.
UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

DELPHI CORPORATION, et al

Debtors.

Chapter 11

Case No. 05-44481 (RDD)
(Jointly Administered)

**RESPONSE OF COOPER-STANDARD AUTOMOTIVE INC. TO DEBTORS’
TWENTY-FIRST OMNIBUS OBJECTION PURSUANT TO 11 U.S.C. § 502(B) AND
FED. R. BANKR. P. 3007 TO CERTAIN (A) DUPLICATE OR AMENDED CLAIMS; (B)
UNTIMELY EQUITY CLAIM; (C) INSUFFICIENTLY DOCUMENTED CLAIMS; (D)
CLAIMS NOT REFLECTED ON DEBTORS’ BOOKS AND RECORDS, (E) UNTIMELY
CLAIM, AND (F) CLAIMS SUBJECT TO MODIFICATION, TAX CLAIM SUBJECT
TO MODIFICATION AND MODIFIED CLAIMS ASSERTING RECLAMATION**

Cooper-Standard Automotive Inc. (“Cooper-Standard”) states the following in support of its response to Debtors’ Twenty-First Omnibus Objection pursuant to 11 U.S.C. § 502(b) and Fed. R. Bankr. P. 3007 to certain (A) Duplicate or Amended Claims; (B) Untimely Equity Claim; (C) Insufficiently Documented Claims; (D) Claims not Reflected on Debtors’ Books and Records, (E) Untimely Claim, and (F) Claims Subject to Modification, Tax Claim Subject to Modification, and Modified Claims Asserting Reclamation (“Twenty-First Omnibus Objection”):

INTRODUCTION

1. On October 8, 2005, Delphi Corporation and various affiliates and/or subsidiaries (collectively “Debtors”) filed a petition for relief under chapter 11 of the United States Bankruptcy Code.

2. On July 31, 2006, Cooper-Standard filed proof of claim #14664 in the total amount of \$2,624,997.09 as a general unsecured claim (“Claim”). On or about May 16, 2007, Cooper-Standard assigned its claim to Deutsche Bank Securities, Inc. (“Deutsche”). Deutsche has agreed to allow Cooper-Standard to respond to the Twenty-First Omnibus Objection. The Claim is supported by invoices which Cooper-Standard has provided to Debtors.

3. In the Twenty-First Omnibus Objection, Debtors seek to reduce the Claim. Further, Debtors seek to modify the Debtor against which the Claim is asserted. Presently, the Claim is against Delphi Corporation. Debtors seek a determination that the Claim is properly against Delphi Automotive Systems, LLC. Debtors do not give any legal reason for the proposed reduction or change of Debtor.

RESPONSE TO OBJECTION

4. In the Twenty-First Omnibus Objection, Debtors are asking the Court to reduce and modify the Claim. Cooper-Standard does not object to the modification of the Debtor against which the Claim is asserted. However, Cooper-Standard objects to the reduction of the Claim and the Court should deny this relief because there is no authority allowing it and the Debtors have not cited any such authority in the Omnibus Application.

5. Rule 3001(f) of the Federal Rules of Bankruptcy Procedure provides that “[a] proof of claim executed and filed in accordance with these rules shall constitute prima facie evidence of the validity and amount of the claim.” As the District Court for the Southern District of New York has stated “[a] properly executed and filed proof of claim constitutes prima facie evidence of the validity of the claim. To overcome this prima facie evidence, the objecting party must come forth with evidence which, if believed, would refute at least one of the allegations essential to the claim.” *Carey v. Ernst*, 333 B.R. 666, 672 (S.D.N.Y. 2005) *quoting In re Reilly*, 245 BR 768, 773 (2nd Cir. BAP 2000). *See also In re White*, 168 BR 825, 828-829 (Bankr. D. Conn. 1994) (objecting party may not rebut a claim’s prima facie validity by merely stating the amount of the claim is incorrect but must produce evidence to support such argument).

6. In the Twenty-First Omnibus Objection, Debtors do not provide any evidence whatsoever to support their proposed reduction of the Claim, let alone any evidence sufficient to refute the prima facie validity of the Claim. Because Debtors have not rebutted the prima facie validity of the Claim, the Twenty-First Omnibus Objection should be denied with respect to the Claim.

7. Any reply to this Response should be addressed to the following:

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8. The contact information for persons who possess the authority to reconcile, settle or otherwise resolve the Twenty-First Omnibus Objection to the claim on behalf of Cooper-Standard is:

Guy Todd
Cooper-Standard Automotive, Inc.
39950 Orchard Hill Place Drive
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9. Cooper-Standard reserves all of its rights and remedies.

RELIEF REQUESTED

THEREFORE, Cooper-Standard respectfully requests that the Court deny the relief requested under the Twenty-First Omnibus Objection as to the Claim.

BODMAN LLP

By: /s/ Ralph E. McDowell
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October 18, 2007

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing ***Response of Cooper-Standard Automotive Inc. to Debtors' Twenty-First Omnibus Objection Pursuant to 11 U.S.C. § 502(b) and Fed. R. Bankr. P. 3007 to Certain (A) Duplicate or Amended Claims; (B) Untimely Equity Claim; (C) Insufficiently Documented Claims; (D) Claims Not Reflected on Debtors' Books and Records, (E) Untimely Claim, and (F) Claims Subject to Modification, Tax Claim Subject to Modification and Modified Claims Asserting Reclamation*** was electronically filed using the Court's CM/ECF filing system, and that a true and correct copy of the same was served via Federal Express to the parties identified below:

Delphi Corp.
5725 Delphi Drive
(Attn: General Counsel)
Troy, Michigan 48098

Skadden Arps Slate Meagher & Flom LLP
333 West Wacker Drive
Suite 2100
(Attn: John Wm. Butler, Jr.; John K. Lyons, Joseph N. Wharton)
Chicago, Illinois 60606

and

The Honorable Robert D. Drain
United States Bankruptcy Judge
U.S. Bankruptcy Court for the Southern District of New York
One Bowling Green
Room 610
New York, New York 10004

Dated: October 18, 2007

/s/ Ralph E. McDowell
Ralph E. McDowell